

REQUEST NO. 17:

17. Please produce all communications by William Cain concerning Steven Woodward.

RESPONSE TO REQUEST NO. 17:

Plaintiff objects to this request as overly broad, unduly burdensome and not reasonably calculated to lead to discoverable information. Any communications involving Dr. Cain are not relevant to whether Defendant defamed Plaintiff or violated its marks. Similarly, as Defendant has raised no affirmative defenses, this information cannot be relevant to these defenses. Defendant's request is not reasonably limited in time or manner to identify the documents sought with any reasonable particularity.

To the extent that Defendant requests documents included in his student file, Plaintiff will search for this file and make it available for inspection or copying at a mutually convenient date and time at the offices of Plaintiff's counsel.

REQUEST NO. 18:

18. Please produce a copy of all documentation identified by Plaintiff's Rule 26 disclosures.

RESPONSE TO REQUEST NO. 18:

These documents are all copies of information Defendant has published on his website and as such, he is already in possession of the same. To the extent that Plaintiff has procured copies of some of these files, it will make the same available for inspection or copying at Defendant's expense.

REQUEST NO. 19:

19. Please produce a copy of all exhibits or demonstrative aids which the Plaintiff intends to rely upon at trial (sic).

RESPONSE TO REQUEST NO. 19:

These documents are all copies of information Defendant has published on his website and as such, he is already in possession of the same. To the extent that Plaintiff has procured copies of some of these files, it will make the same available for inspection or copying at Defendant's expense.

REQUEST NO. 20:

20. Please produce a complete copy of the AUA student file for Steven Woodward.